

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA**

KEYBANK NATIONAL ASSOCIATION,
a national banking association, successor
by merger to First Niagara Bank, N.A.,

Plaintiff,

v.

T.J.V. HOLDINGS, LLC; VELTRI
ELECTRIC, INC.; JOHN A. VELTRI, JR.;
and TAMI J. VELTRI,

Defendants.

Civil Action No. 2:21-CV-1337-NBF

**REQUEST FOR CLERK'S
CERTIFICATE OF DEFAULT AS TO
DEFENDANTS T.J.V. HOLDINGS,
LLC; VELTRI ELECTRIC, INC.,
JOHN A. VELTRI, JR.; AND TAMI J.
VELTRI**

Pursuant to Federal Rule of Civil Procedure 55(a), Plaintiff, KeyBank National Association ("KeyBank") requests a Clerk's Certificate of Entry of Default as to Defendants T.J.V. Holdings, LLC, Veltri Electric, Inc., John A. Veltri, Jr., and Tami J. Veltri. Within an accompanying affidavit, I affirm that the parties against whom the Judgment is sought:

1. Are not infants or incompetent persons;
2. Are not in the military service of the United States;
3. Were properly served under Federal Rule of Civil Procedure 4, and a proof of service having been filed with the Court; and
4. Have defaulted in appearance in the above captioned action.

Respectfully submitted,

Date: January 24, 2022

WONG FLEMING

/s/ Dafney Dubuisson Stokes

Dafney Dubuisson Stokes, Esq.

821 Alexander Road, Suite 200

Princeton, New Jersey 08540

Tel: 609-951-9520

Fax: 609-951-0270

dstokes@wongfleming.com

